

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
"AZZMADOR" RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL "ENOCHE"
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

**STIPULATION AND [PROPOSED] ORDER CONCERNING
DEFENDANT SPENCER'S MOTION TO COMPEL (ECF 369)**

WHEREAS on June 20, 2018, Defendant Richard Spencer served his First Request for Production of Documents to All Plaintiffs (the "Requests");

WHEREAS on July 23, 2018, Plaintiffs served their responses and objections to the Requests;

WHEREAS in August 2018 and October 2018, there was correspondence between Plaintiffs and Defendant Spencer concerning Plaintiffs' responses to the Requests;

WHEREAS on October 26, 2018, Defendant Spencer filed a Motion to Compel Production of Documents (the "Motion," ECF 369);

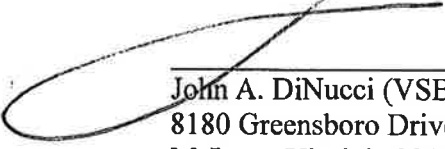
WHEREAS Plaintiffs have produced and are in the process of producing additional documents to Defendant Spencer and anticipate substantially completing the production of documents in their possession by November 20, 2018, but will continue producing additional non-privileged, responsive documents in a timely manner, if and when any such documents become available, throughout the above-captioned litigation;

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned attorneys for the parties, that:

1. Defendant Spencer's Motion is withdrawn without prejudice to his filing a new or renewed motion to compel production from Plaintiffs, including to compel production from Plaintiffs in response to Requests to which Plaintiffs have objected, if, after Defendant Spencer has in good faith conferred or attempted to confer with Plaintiffs, the parties are not able to resolve the dispute; and

2. Plaintiffs need not file any opposition to the Motion.

Dated: November 8, 2018



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Counsel for Plaintiffs

November ____, 2018

SO ORDERED: _____
Hon. Joel C. Hoppe, U.S.M.J.